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Attorneys for Plaintiff

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

MORELOCK ENTERPRISES,

Civil No. 3:04-cv-00583-PA

Plaintiff,

WEYERHAEUSER COMPANY, Defendant.

CONSENT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

CONSENT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT- PAGE 1

Berry & Baruch 1717 Pennsylvania Ave., NW, Suite 450 Washington, DC 20006-1809 With the consent of Defendant Weyerhaeuser Company, Plaintiff Morelock Enterprises ("Morelock"), on behalf of the Class, hereby respectfully moves this Court for the following:

- Preliminary approval of a settlement of this action, as set forth in the Settlement
   Agreement set forth as Exhibit 1 hereto.
- 2. A stay of all proceedings in this case other than those relating to the settlement.
- 3. Authorization to send notice to the Class of the preliminary settlement in the form set forth as Exhibit 2 hereto.
- 4. Confirmation by the Court of the new names of the firms serving as Class Counsel

   that is, Berry & Baruch (successor to Berry & Leftwich) and O'Donnell, Clark &

  Crew LLP (successor to O'Donnell & Clark and Ramis, Crew, Corrigan & Bachrach)

  (the other firm serving as Class Counsel, Karnopp Petersen LLP, is unchanged).

For the reasons set forth here and in the accompanying Memorandum, Morelock respectfully requests that its Motion be granted.

Dated: May 13, 2009

KARNOPP PETERSEN LLP

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Respectfully submitted,

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By: /s/

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Attorneys for Plaintiff Morelock Industries, Inc. and the Class

CONSENT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT- PAGE 3

Berry & Baruch 1717 Pennsylvania Ave., NW, Suite 450 Washington, DC 20006-1809

## **CERTIFICATE OF SERVICE**

i nereby certify that the foregoing was serv	ed via email on Defendants' counsel of record
through the Court's electronic filing system.	
	<u>/s/</u>
	Gregory Baruch

CONSENT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT- PAGE 4

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